



The Fast Law Firm, P.C.

521 Fifth Avenue, 17 Floor | New York, NY 10175 | Phone: (212) 729-9494

February 6, 2023

Via ECF

Hon. Jesse M. Furman
U.S. District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Khalid Alboushari, 19 cr 17
Request for a 30-day Extension of Motion Schedule and Conference

Dear Judge Furman:

I represent Mr. Khalid Alboushari on the above-captioned matter. I write with the consent of the Government to respectfully request for a 30-day extension of the motion schedule and pre-trial conference.

This is the first adjournment request of the motion schedule and the pre-trial conference. Currently, the Defense motions are due by February 9, 2023, opposition is due by February 23, 2023, and replies are due by March 2, 2023. The pre-trial conference is scheduled for February 16, 2023. Defense respectfully submits that this adjournment is necessary to permit defense counsel a reasonable time necessary for effective preparation in this matter and to allow the parties to conduct plea negotiations.

I have conferred with AUSA James Ligtenberg and he consents to this adjournment. The parties are available for a pre-trial conference any time in mid-late March with the exception of March 16 and March 17, 2023.

Thank you for your time and consideration of this request.

Respectfully Submitted,

s/ Elena Fast
Elena Fast, Esq.
Counsel for Khalid Alboushari

Application GRANTED. Defense motions are due by March 17, 2023, the Government's opposition is due by March 31, 2023, and any reply is due by April 7, 2023. The pretrial conference is hereby ADJOURNED to March 23, 2023, at 3:15 p.m.. Time is excluded in the interests of justice from today February 7, 2023 until March 23, 2023 for the reasons stated in counsel's letter.

The Clerk of Court is directed to terminate Doc. #18.

SO ORDERED.

February 7, 2023